



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
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OFFICE OF  
AIR AND WASTE

February 21, 2018

Laura K. Perry  
Coordinator – Air Quality  
ConocoPhillips Alaska, Inc.  
P.O. Box 100360  
Anchorage, Alaska 99510-03600

**Subject:** ConocoPhillips Alaska, Inc. (CPAI) Alternative Monitoring Request under New Source Performance Standards Subpart OOOOa, Leak Detection and Repair (LDAR) Requirements

Dear Ms. Perry:

Thank you for your letter of August 31, 2017, where you submitted an alternative monitoring request under the New Source Performance Standard, 40 C.F.R. Part 60 Subpart OOOOa, for Crude Oil and Natural Gas Facilities for which Construction, Modification, and Reconstruction Commenced after September 18, 2015 ("NSPS OOOOa"). We have reviewed your request and determined that we cannot act on the request without additional information.

According to your request, ConocoPhillips Alaska, Inc. operates crude oil production facilities on the Alaska North Slope. The production facilities contain multiple well sites connected to a central processing facility. The well sites contain a combination of surface equipment located in enclosure buildings, such as piping manifolds, wellheads, and freeze protection storage. According to your request, some of these well sites operate at or close to ambient temperature, while others are heated.

ConocoPhillips Alaska, Inc., has requested an alternative monitoring protocol for the leak detection requirements in the fugitive emissions greenhouse gas and volatile organic compound standards applicable to well sites in NSPS OOOOa, found at 40 C.F.R. § 60.5397a. Fugitive emissions are defined, for the purposes of 40 C.F.R. § 60.5397a, as any visible emission from a fugitive emissions component observed using optical gas imaging (OGI) or an instrument reading of 500 ppm or greater using Method 21 of Appendix A-7 of 40 C.F.R. Part 60 ("Method 21"). The regulation at 40 C.F.R. § 60.5397a requires both initial and routine monitoring surveys of fugitive emissions components at well sites. The surveys must be conducted using either OGI or Method 21.

In the August 31, 2017, letter, ConocoPhillips Alaska, Inc. explains that using OGI or Method 21 to detect leaks is not possible for unheated well sites during a "low ambient temperature exclusion period" (defined as between the months of November and April when the ambient temperatures are typically below 0° F). ConocoPhillips proposes to use audible, visual, or olfactory (AVO) inspections when using Method 21 or OGI is not possible at unheated well sites during the low ambient temperature exclusion period.

We cannot act on your request at this time because the request does not include a demonstration that use of AVO on the proposed schedule is an effective method of leak detection for the purposes of complying with the applicable fugitive emissions standards in NSPS OOOOa. ConocoPhillips Alaska, Inc.'s demonstration

must also include an explanation of the procedures and training the company intends to follow to ensure the effectiveness of leak detection using AVO.

EPA will continue to review your request once we have received the required demonstration. If you have any questions, contact Madonna Narvaez of my staff at 206.553.2117, or by email at [narvaez.madonna@epa.gov](mailto:narvaez.madonna@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Kelly McFadden".

Kelly McFadden, Acting Manager  
Stationary Source Unit